

217/782-2113

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT - REVISED

PERMITTEE

Reliant Energy Wholesale Generation, LLC
Attn: Steve Rossing
2909 Eola Road
Aurora, Illinois 60504

Application No.: 02030076

I.D. No.: 043407AAF

Applicant's Designation:

Operation of: Electric Power Plant

Date Application Originally Received: March 28, 2002

Date Application Originally Issued: November 25, 2003

Permit Expiration Date¹: November 25, 2008

Date Application for Permit Modification Received: December 16, 2004

Date Revised Permit Issued: To be determined

Source Location: 2909 Eola Road, Aurora, DuPage County, Winfield Township

Responsible Official: Mr. W. F. McGuire, Vice President of Environmental, Safety, and
Industrial Health

This permit is hereby granted to the above-designated Permittee to OPERATE an electric power plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

The current federal Acid Rain Permit issued to Reliant Energy by the Illinois EPA for this source is incorporated into this CAAPP permit. (See Attachment 2.)

The permit contains revisions to the prior permit that were made pursuant to above referenced application for modification to the permit and the procedures for significant modifications of CAAPP Permits in Section 39.5(14) of the Environmental Protection Act. (For information describing the revisions, refer to Attachment 4, General Description of the Revisions to this Permit.)

If you have any questions concerning this permit, please contact Manish Patel at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:MNP:

cc: Illinois EPA, FOS, Region 1
USEPA

¹ Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Reliant Energy Wholesale Generation, LLC
2909 Eola Road
Aurora, Illinois 60504
713/945-7626

I.D. No.: 043407AAF
Acid Rain Permit ORIS Code No.: 55279

SIC Code: 4911, Electricity Generation, Transmission or Distribution

1.2 Owner/Parent Company

Reliant Energy Wholesale Generation, LLC
2909 Eola Road
Aurora, Illinois 60504

1.3 Operator

Reliant Energy Wholesale Generation, LLC
2909 Eola Road
Aurora, Illinois 60504

Steve Rossing, 713/488-7965

1.4 General Source Description

Reliant Energy Wholesale Generation LLC operates combustion turbines for the purpose of generating electricity. The source operates support equipment for the turbines, including indirect-fired fuel gas preheaters, inlet air water heaters, and an emergency diesel engine-generator.

1.5 Title I Conditions

This CAAPP permit contains certain conditions for units at this source that address the applicability of permitting programs for the construction and modification of sources, which programs were established pursuant to Title I of the Clean Air Act (CAA) and regulations thereunder. These programs include 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification (MSSCAM), and are implemented by the Illinois EPA pursuant to Sections 9, 9.1, 39(a) and 39.5(7)(a) of Illinois' Environmental Protection Act (Act). These "Title I conditions" within this permit are specifically designated as "T1," if they reflect requirements established in construction permits issued for this source, "T1R" if they revise requirements established in such construction permits, or "T1N" if they are newly established in this CAAPP permit. These conditions continue in effect, notwithstanding the expiration date specified on the first page of this permit, as their authority derives from Titles I and V of the CAA, as well as Titles II and X of the Act. (See also Condition 8.7.)

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
EGU	electrical generating unit(s)
ERMS	Emissions Reduction Market System (35 IAC Part 205)
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
LAER	Lowest Achievable Emission Rate
lb	pound
MACT	Maximum Achievable Control Technology
mmBtu	Million British thermal units
MSSCAM	Major Stationary Sources Construction and Modification (MSSCAM), 35 IAC Part 203
MW	megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
NSSA	new source set-aside
ORIS	Office of Regulatory Information System
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration (40 CFR 52.21)
RMP	Risk Management Plan
SO ₂	Sulfur Dioxide
T	ton (2000 pounds)
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a) (1) and 201.211, as follows:

None

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a) (2) or (a) (3), as follows:

None

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a) (4) through (18), as follows:

Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a) (11)].

Storage tanks of any size containing exclusively soaps, detergents, surfactants, glycerin, waxes, vegetable oils, greases, animal fats, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions, provided an organic solvent has not been mixed with such materials [35 IAC 201.210(a) (17)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.

- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
CTG01	170 MW Natural Gas Fired Turbine (1,885 mmBtu/hr)	June 2000	Dry Low NO _x Burners
CTG02	170 MW Natural Gas Fired Turbine (1,885 mmBtu/hr)	June 2000	Dry Low NO _x Burners
CTG03	170 MW Natural Gas Fired Turbine (1,885 mmBtu/hr)	June 2000	Dry Low NO _x Burners
CTG04	170 MW Natural Gas Fired Turbine (1,885 mmBtu/hr)	June 2000	Dry Low NO _x Burners
CTG05	45 MW Natural Gas Fired Turbine (444 mmBtu/hr)	June 2000	Water Injection System
CTG06	45 MW Natural Gas Fired Turbine (444 mmBtu/hr)	June 2000	Water Injection System
CTG07	45 MW Natural Gas Fired Turbine (444 mmBtu/hr)	June 2000	Water Injection System
CTG08	45 MW Natural Gas Fired Turbine (444 mmBtu/hr)	June 2000	Water Injection System
CTG09	45 MW Natural Gas Fired Turbine (444 mmBtu/hr)	June 2000	Water Injection System
CTG10	45 MW Natural Gas Fired Turbine (444 mmBtu/hr)	June 2000	Water Injection System
HTR-1	Natural Gas Heater (12.0 mmBtu/hr)	June 2000	None
EHT-1	Emergency Natural Gas Heater (1.0 mmBtu/hr)	September 2004	None
IAT-5A/B to 8A/B	4 - Inlet Air Dual Burner Water Heaters (2 burners @ 2.4 mmBtu/hr each)	September 2004	None
EDG-1	Emergency Diesel Engine Generator (Nominal 1100 KW)	September 2004	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of NO_x and CO emissions.
- 5.1.2 This permit is issued based on the source not being a major source of HAPs.
- 5.1.3 This permit is issued based on the source requiring a CAAPP permit as an "affected source" for the purposes of Acid Deposition Control, Title IV of the Clean Air Act.

5.2 Applicable Regulations

- 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.
- 5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:
 - a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
 - b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.
- 5.2.3 Fugitive Particulate Matter Operating Program
 - a. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions. [35 IAC 212.309(a)]
 - b. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA. [35 IAC 212.312]

- c. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program. [35 IAC 212.306]

5.2.4 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.5 Risk Management Plan

Pursuant to 40 CFR 68.215(a)(2)(i) and (ii), should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by Condition 9.8.

- 5.2.6 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual

compliance certification, as required by Condition 9.8.

- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.
- c. This stationary source will be subject to 40 CFR Part 63 when such rule becomes final and effective. The Permittee shall comply with the applicable requirements of such regulation by the date(s) specified in such regulation and shall certify compliance with the applicable requirements of such regulation as part of the annual compliance certification required by Condition 9.8 beginning in the year that compliance is required under a final and effective rule.

5.2.7 Episode Action Plan

- a. Pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to Illinois EPA.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the

following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	9.3
Sulfur Dioxide (SO ₂)	3.1
Particulate Matter (PM)	28.6
Nitrogen Oxides (NO _x)	248.1
HAP, not included in VOM or PM	---
Total	289.1

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs.

5.5.3 Other Source-Wide Emission Limitations

The emissions from the source, including insignificant activities, shall not equal or exceed the following limitations. These limitations are set pursuant to the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 and state rules for Major Stationary Sources Construction and Modification (MSSCAM), 35 IAC Part 203, to ensure that the original construction and subsequent operation of the source are not a major source for purposes of these rules. [T1R]

<u>Pollutant</u>	<u>Limitation (Tons/year)</u>
VOM	9.5
SO ₂	3.2
PM	32.0
NO _x	249.0
CO	210.0

Note: There are also unit specific emission limitations in Section 7 of this permit pursuant to PSD and MSSCAM.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5, pursuant to Section 39.5(7)(b) of the Act:

- a. Total annual emissions on a calendar year basis for the emission units covered by Section 7 of this permit (Unit Specific Conditions).
- b. Total annual emissions on a calendar year basis for the insignificant emission units at the sources, including cooling towers, which are addressed by Section 3.0 of this permit (Insignificant Activities), with supporting calculations.

5.6.2 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

- a. For emissions units that are addressed by the unit-specific conditions of this permit, the timing for reporting of deviations shall be in accordance with such conditions.
- b. i. For other emissions units and activities at the source, the timing for reporting of

deviations shall be in accordance with the provisions of relevant regulations if such provisions address timing of deviation reports.

- ii. Otherwise, if the relevant regulations do not address timing of deviation reports, deviation reports shall be submitted within 30 days.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

None

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits in Condition 5.5.1 shall be based on the recordkeeping requirements of Condition 5.6.1(a) and the provisions of Section 7 (Unit Specific Conditions) of this permit.

6.0 EMISSIONS CONTROL PROGRAMS

6.1 NO_x Trading Program

6.1.1 Description of NO_x Trading Program

The NO_x Trading Program is a regional "cap and trade" market system for large sources of NO_x emissions in the eastern United States, including Illinois. It is designed to reduce and maintain NO_x emissions from the emission units covered by the program within a budget to help contribute to attainment and maintenance of the ozone ambient air quality standard in the multi-state region covered by the program, as required by Section 126 of the CAA. The NO_x Trading Program applies in addition to other applicable requirements for NO_x emissions and in no way relaxes these other requirements.

Electrical generating units (EGU) that are subject to the NO_x Trading Program are referred to as "budget EGU." Sources that have one or more EGU or other units subject to the NO_x Trading Program are referred to as budget sources.

The NO_x Trading Program controls NO_x emissions from budget EGU and other budget units during a seasonal control period from May 1 through September 30 of each year, when weather conditions are conducive to formation of ozone in the ambient air. By November 30 of each year, the allowance transfer deadline, each budget source must hold "NO_x allowances" for the actual NO_x emissions of its budget units during the preceding control period. The USEPA will then retire NO_x allowances in the source's accounts in amounts equivalent to its seasonal emissions. If a source does not have sufficient allowances in its accounts, USEPA would subtract allowances from the source's future allocation for the next control period and impose other penalties as appropriate. Stringent monitoring procedures developed by USEPA apply to budget units to assure that actual emissions of NO_x emissions are accurately determined.

The number of NO_x allowances available for budget sources is set by the overall budget for NO_x emissions established by USEPA. This budget requires a substantial reduction in NO_x emissions from historical levels as necessary to meet air quality goals. In Illinois, existing budget sources initially receive their allocation or share of the NO_x allowances budgeted for EGU in an amount determined by rule [35 IAC Part 217, Appendix F]. Between 2007 and 2011, the allocation mechanism for existing EGU gradually shifts to one based on the actual operation of EGU in preceding control periods. New budget EGU, for which limited operating data may be available, may obtain NO_x allowances from the new source set-aside (NSSA), a portion of the overall budget reserved for new EGU.

In addition to directly receiving or purchasing NO_x allowances as described above, budget sources may transfer

NO_x allowances from one of their units to another. They may also purchase allowances in the marketplace from other sources that are willing to sell some of the allowances that they have received. Each budget source must designate an account representative to handle all its allowance transactions. The USEPA, in a central national system, will maintain allowance accounts and record transfer of allowances among accounts.

The ability of sources to transfer allowances will serve to minimize the costs of reducing NO_x emissions from budget units to comply with the overall NO_x budget. In particular, the NO_x emissions of budget units that may be most economically controlled will be targeted by sources for further control of emissions. This will result in a surplus of NO_x allowances from those units that can be transferred to other units at which it is more difficult to control NO_x emissions. Experience with reduction of sulfur dioxide emissions under the federal Acid Rain program has shown that this type of trading program not only achieves regional emission reductions in a more cost-effective manner but also results in greater overall reductions than application of traditional emission standards to individual emission units.

The USEPA developed the plan for the NO_x Trading Program with assistance from affected states. Illinois' rules for the NO_x Trading Program for EGU are located at 35 IAC Part 217, Subpart W, and have been approved by the USEPA. These rules provide for interstate trading of NO_x allowances, as mandated by Section 9.9 of the Act. Accordingly, these rules refer to and rely upon federal rules at 40 CFR Part 96, which have been developed by USEPA for certain aspects of the NO_x Trading Program, and which an individual state must follow to allow for interstate trading of allowances.

Note: This narrative description of the NO_x Trading Program is for informational purposes only and is not enforceable.

6.1.2 Applicability

- a. The following emission units at this source are budget EGU for purposes of the NO_x Trading Program. Accordingly, this source is a budget source and the Permittee is the owner or operator of a budget source and budget EGU. In this section of this permit, these emission units are addressed as budget EGU.

10 Turbines - CTG01, CTG02, CTG03, CTG04,
CTG05, CTG06, CTG07, CTG08, CTG09 and CTG010

- b. This permit does not provide "low-emitter status" for the above emission units pursuant to 35 IAC 217.754(c).

6.1.3 General Provisions of the NO_x Trading Program

- a. This source and the budget EGU at this source shall comply with all applicable requirements of Illinois' NO_x Trading Program, i.e., 35 IAC Part 217, Subpart W, and 40 CFR Part 96 (excluding 40 CFR 96.4(b) and 96.55(c), and excluding 40 CFR 96, Subparts C, E and I), pursuant to 35 IAC 217.756(a) and 217.756(f) (2).
- b. Any provision of the NO_x Trading Program that applies to a budget source (including any provision applicable to the account representative of a budget source) shall also apply to the owner and operator of such budget sources and to the owner and operator of each budget EGU at the source, pursuant to 35 IAC 217.756(f) (3).
- c. Any provision of the NO_x Trading Program that applies to a budget EGU (including any provision applicable to the account representative of a budget EGU) shall also apply to the owner and operator of such budget EGU. Except with regard to requirements applicable to budget EGUs with a common stack under 40 CFR 96, Subpart H, the owner and operator and the account representative of one budget EGU shall not be liable for any violation by any other budget EGU of which they are not an owner or operator or the account representative, pursuant to 35 IAC 217.756(f) (4).

6.1.4 Requirements for NO_x Allowances

- a. Beginning in 2004, by November 30 of each year, the allowance transfer deadline, the account representative of each budget EGU at this source shall hold allowances available for compliance deduction under 40 CFR 96.54 in the budget EGU's compliance account or the source's overdraft account in an amount that shall not be less than the budget EGU's total tons of NO_x emissions for the preceding control period, rounded to the nearest whole ton, as determined in accordance with 40 CFR 96, Subpart H, plus any number necessary to account for actual utilization (e.g., for testing, start-up, malfunction, and shut down) under 40 CFR 96.42(e) for the control period, pursuant to 35 IAC 217.756(d) (1). For purposes of this requirement, an allowance may not be utilized for a control period in a year prior to the year for which the allowance is allocated, pursuant to 35 IAC 217.756(d) (5).
- b. The account representative of a budget EGU that has excess emissions in any control period, i.e., NO_x emissions in excess of the number of NO_x allowances held as provided above, shall surrender allowances as required for deduction under 40 CFR 96.54(d) (1), pursuant to 35 IAC 201.756(f) (5). In addition, the

owner or operator of a budget EGU that has excess emissions shall pay any fine, penalty, or assessment, or comply with any other remedy imposed under 40 CFR 96.54(d)(3) and the Act, pursuant to 35 IAC 217.756(f)(6). Each ton of NO_x emitted in excess of the number of NO_x allowances held as provided above for each budget EGU for each control period shall constitute a separate violation of 35 IAC Part 217 and the Act, pursuant to 35 IAC 217.756(d)(2).

- c. An allowance allocated by the Illinois EPA or USEPA under the NO_x Trading Program is a limited authorization to emit one ton of NO_x in accordance with the NO_x Trading Program. As explained by 35 IAC 217.756(d)(6), no provisions of the NO_x Trading Program, the budget permit application, the budget permit, or a retired unit exemption under 40 CFR 96.5 and no provision of law shall be construed to limit the authority of the United States or the State of Illinois to terminate or limit this authorization. As further explained by 35 IAC 217.756(d)(7), an allowance allocated by the Illinois EPA or USEPA under the NO_x Trading Program does not constitute a property right. As provided by 35 IAC 217.756(d)(4), allowances shall be held in, deducted from, or transferred among allowances accounts in accordance with 35 IAC Part 217, Subpart W, and 40 CFR 96, Subparts F and G.

6.1.5 Monitoring Requirements for Budget EGU

- a. The Permittee shall comply with the monitoring requirements of 40 CFR Part 96, Subpart H, for each budget EGU and the compliance of each budget EGU with the emission limitation under Condition 6.1.4(a) shall be determined by the emission measurements recorded and reported in accordance with 40 CFR 96, Subpart H, pursuant to 35 IAC 217.756(c)(1), (c)(2) and (d)(3).
- b. The account representative for the source and each budget EGU at the source shall comply with those sections of the monitoring requirements of 40 CFR 96, Subpart H, applicable to an account representative, pursuant to 35 IAC 217.756(c)(1) and (d)(3).

Note: Pursuant to 40 CFR 96.70(b), new budget EGU that commence operation before January 1, 2003 are to begin complying with applicable monitoring requirements of 40 CFR Part 96 at least one year in advance of the start of the first control period governed by the NO_x Trading Program.

6.1.6 Recordkeeping Requirements for Budget EGU

Unless otherwise provided below, the Permittee shall keep on site at the source each of the following documents for

a period of 5 years from the date the document is created. This 5-year period may be extended for cause at any time prior to the end of the 5 years, in writing by the Illinois EPA or the USEPA.

- a. The account certificate of representation of the account representative for the source and each budget EGU at the source and all documents that demonstrate the truth of the statements in the account certificate of representation, in accordance with 40 CFR 96.13, as provided by 35 IAC 217.756(e) (1) (A). These certificates and documents must be retained on site at the source for at least 5-years after they are superseded because of the submission of a new account certificate of representation changing the account representative.
- b. All emissions monitoring information, in accordance with 40 CFR 96, Subpart H, (provided that to the extent that 40 CFR 96, Subpart H, provides for a 3-year period for retaining records, the 3-year period shall apply), pursuant to 35 IAC 217.756(e) (1) (B).
- c. Copies of all reports, compliance certifications, and other submissions and all records made or required under the NO_x Trading Program or documents necessary to demonstrate compliance with requirements of the NO_x Trading Program, pursuant to 35 IAC 217.756(e) (1) (C).
- d. Copies of all documents used to complete a budget permit application and any other submission under the NO_x Trading Program, pursuant to 35 IAC 217.756(e) (1) (D).

6.1.7 Reporting Requirements for Budget EGU

- a. The account representative for this source and each budget EGU at this source shall submit to the Illinois EPA and USEPA the reports and compliance certifications required under the NO_x Trading Program, including those under 40 CFR 96, Subparts D and H, and 35 IAC 217.774, pursuant to 35 IAC 217.756(e) (2).
- b. Notwithstanding the provisions in Conditions 9.8 and 9.9 of this CAAPP permit, these submittals need only be signed by the designated representative, who may serve in place of the responsible official for this purpose, as provided by Section 39.5(1) of the Act, and submittals to the Illinois EPA need only be made to the Illinois EPA, Air Compliance Section.

6.1.8 Allocation of NO_x Allowances to Budget EGU

- a. For 2004, 2005 and 2006, the budget EGU identified in Condition 6.1.2(a) will not be entitled to direct allocations of NO_x allowances because these EGU will

be considered "new" budget EGU, as defined in 35 IAC 217.768(a)(1).

- b.
 - i. Beginning in 2007, these budget EGU will cease to be "new" budget EGU and the source will be entitled to an allocation of NO_x allowances for these budget EGU as provided in 35 IAC 217.764. For example, for 2007, the allocation of NO_x allowances will be governed by 35 IAC 217.764(b)(2) and (b)(4).
 - ii. In accordance with 35 IAC 217.762, the theoretical number of NO_x allowances for these budget EGU, calculated as the product of the applicable NO_x emissions rate and heat input as follows, shall be the basis for determining the allocation of NO_x allowances to these EGU:
 - A. As provided by 35 IAC 217.762(a)(2), the applicable NO_x emission rates are 0.056 lb/mmBtu for the EGU CTG01 to CTG04 and 0.093 lb/mmBtu for the EGU CTG05 to CTG10. These are the permitted emission rates for these EGU as contained in Construction Permit 99110018, pursuant to which the EGU were constructed. The permitted emission rates are the applicable rates because they are between 0.15 lb/mmBtu and 0.055 lb/mmBtu, as provided by 35 IAC 217.762(a)(2).
 - B. The applicable heat input (mmBtu/control period) shall be the average of the two highest heat inputs from the control periods four to six years prior to the year for which the allocation is being made, as provided by 35 IAC 217.762(b)(1).

6.1.9 Eligibility for NO_x Allowances from the New Source Set-Aside (NSSA)

- a. In 2004, 2005 and 2006, the budget EGU identified in Condition 6.1.2(a) will qualify as "new" budget EGU that commenced commercial operation prior to January 1, 2004. As such, the Permittee may be entitled to obtain NO_x allowances from the NSSA for these EGU without charge, as provided by 35 IAC 217.768.
- b. For the purpose of any such request for NO_x allowances, the NO_x emission rate shall be the permitted emission rate of these EGU as specified in Condition 6.1.8(b)(ii) and the projected heat input shall not exceed the average of the EGU's two highest seasonal heat inputs for the control periods one to three years prior to the allocation year, pursuant to 35 IAC 217.768(e).

6.1.10 Budget Permit Required by the NO_x Trading Program

- a. For this source, this segment of the CAAPP Permit, i.e., Section 6.1, is the Budget Permit required by the NO_x Trading Program and is intended to contain federally enforceable conditions addressing all applicable NO_x Trading Program requirements. This Budget Permit shall be treated as a complete and segregable portion of the source's entire CAAPP permit, as provided by 35 IAC 217.758(a) (2).
- b. The Permittee and any other owner or operator of this source and each budget EGU at the source shall operate the budget EGU in compliance with this Budget Permit, pursuant to 35 IAC 217.756(b) (2).
- c. No provision of this Budget Permit or the associated application shall be construed as exempting or excluding the Permittee, or other owner or operator and, to the extent applicable, the account representative of a budget source or budget EGU from compliance with any other regulation or requirement promulgated under the CAA, the Act, the approved State Implementation Plan, or other federally enforceable permit, pursuant to 35 IAC 217.756(g).
- d. Upon recordation by USEPA under 40 CFR 96, Subpart F or G, or 35 IAC 217.782, every allocation, transfer, or deduction of an allowance to or from the budget units' compliance accounts or to or from the overdraft account for the budget source is deemed to amend automatically, and become part of, this budget permit, pursuant to 35 IAC 217.756(d) (8). This automatic amendment of this budget permit shall be deemed an operation of law and will not require any further review.
- e. No revision of this Budget Permit shall excuse any violation of the requirements of the NO_x Trading Program that occurs prior to the date that the revisions to this permit takes effect, pursuant to 35 IAC 217.756(f) (1).
- f. The Permittee, or other owner or operator of the source, shall reapply for a Budget Permit for the source as required by 35 IAC Part 217, Subpart W and Section 39.5 of the Act. For purposes of the NO_x Trading Program, the application shall contain the information specified by 35 IAC 217.758(b) (2).

6.2 Emissions Reduction Market System (ERMS)

6.2.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2.2 Applicability

This permit is issued based on this source not being a participating source in the Emissions Reduction Market

System (ERMS), 35 IAC Part 205, pursuant to 35 IAC 205.200. This is based on the source's actual VOM emissions during the seasonal allotment period from May 1 through September 30 of each year being less than 10 tons and the source's baseline emissions also being less than 10 tons.

6.2.3 Recordkeeping and Reporting

- a. The Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:
 - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
 - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit; and
 - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.
- b. In the event that the source's VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a participating source in the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in its CAAPP permit.

6.3 Acid Rain Program

6.3.1 Applicability

Under Title IV of the CAA, Acid Deposition Control, this source is an affected source and the following emission units at the source are affected units for acid deposition:

10 Turbines - CTG01, CTG02, CTG03, CTG04, CTG05, CTG06, CTG07, CTG08, CTG09 and CTG010

Note: Title IV of the CAA, and other laws and regulations promulgated thereunder, establish requirements for affected sources related to control of emissions of pollutants that contribute to acid rain. For purposes of this permit, these requirements are referred to as Title IV provisions.

6.3.2 Applicable Emission Requirements

The owners and operators of the source shall not violate applicable Title IV provisions. In particular, NO_x emissions of affected units shall not exceed the limit set by 40 CFR Part 76, which currently is 0.45 lb NO_x per million Btu heat input with the ability for averaging among units as allowed by an Acid Rain Permit. SO₂ emissions of the affected units shall not exceed any allowances that the source lawfully holds under Title IV provisions. [Section 39.5(7)(g) and (17)(l) of the Act]

Note: Affected sources must hold SO₂ allowances to account for the SO₂ emissions from affected units at the source that are subject to Title IV provisions. Each allowance is a limited authorization to emit up to one ton of SO₂ emissions during or after a specified calendar year. The possession of allowances does not authorize exceedances of applicable emission standards or violations of ambient air quality standards.

6.3.3 Monitoring, Recordkeeping and Reporting

The owners and operators of the source and, to the extent applicable, their designated representative, shall comply with applicable requirements for monitoring, recordkeeping and reporting specified by Title IV provisions, including 40 CFR Part 75. [Section 39.5(7)(b) and 17(m) of the Act]

Note: As further addressed by Section 7 of this permit, the following emission determination methods are currently being used for the affected units at this source.

NO_x: Low Mass Emissions Excepted Methodology, 40 CFR 75.19
SO₂: Combustion of Gaseous Fuels, Section 2.3, Appendix D, 40 CFR Part 75

6.3.4 Acid Rain Permit

The owners and operators of the source shall comply with the terms and conditions of the source's Acid Rain permit. [Section 39.5(17)(1) of the Act]

Note: The source is subject to an Acid Rain permit, which was issued pursuant to Title IV provisions, including Section 39.5(17) of the Act. Affected sources must be operated in compliance with their Acid Rain permits. This source's Acid Rain permit is incorporated by reference into this permit and a copy of the current Acid Rain permit is included as Attachment 2 of this permit. Revisions and modifications of this Acid Rain permit, including administrative amendments and automatic amendments (pursuant to Sections 408(b) and 403(d) of the CAA or regulations thereunder) are governed by Title IV provisions, as provided by Section 39.5(13)(e) of the Act. Accordingly, revision or renewal of the Acid Rain permit may be handled separately from this CAAPP permit and a copy of the new Acid Rain permit may be included in this permit by administrative amendment.

6.3.5 Coordination with Other Requirements

- a. This permit does not contain any conditions that are intended to interfere with or modify the requirements of Title IV provisions. In particular, this permit does not restrict the flexibility under Title IV provisions of the owners and operators of this source to amend their Acid Rain compliance plan. [Section 39.5(17)(h) of the Act]
- b. Where another applicable requirement of the CAA is more stringent than an applicable requirement of Title IV provisions, both requirements are incorporated into this permit and are enforceable and the owners and operators of the source shall comply with both requirements. [Section 39.5(7)(h) of the Act]

7.0 UNIT SPECIFIC CONDITIONS

7.1 Turbines (Subject to NSPS - 40 CFR Subpart GG)

7.1.1 Description

The turbines are used to generate electricity. The turbines are fueled with natural gas. The NO_x emissions of the four larger turbines are controlled with dry low NO_x burners. The NO_x emissions of the six smaller turbines are controlled with low NO_x burners that use water injection.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
CTG01	170 MW Natural Gas Fired Turbine (1,885 mmBtu/hr)	Dry Low NO _x Burners
CTG02	170 MW Natural Gas Fired Turbine (1,885 mmBtu/hr)	Dry Low NO _x Burners
CTG03	170 MW Natural Gas Fired Turbine (1,885 mmBtu/hr)	Dry Low NO _x Burners
CTG04	170 MW Natural Gas Fired Turbine (1,885 mmBtu/hr)	Dry Low NO _x Burners
CTG05	45 MW Natural Gas Fired Turbine (444 mmBtu/hr)	Water Injection System
CTG06	45 MW Natural Gas Fired Turbine (444 mmBtu/hr)	Water Injection System
CTG07	45 MW Natural Gas Fired Turbine (444 mmBtu/hr)	Water Injection System
CTG08	45 MW Natural Gas Fired Turbine (444 mmBtu/hr)	Water Injection System
CTG09	45 MW Natural Gas Fired Turbine (444 mmBtu/hr)	Water Injection System
CTG10	45 MW Natural Gas Fired Turbine (444 mmBtu/hr)	Water Injection System

7.1.3 Applicability Provisions and Applicable Regulations

- The "affected turbines" for the purpose of these unit-specific conditions, are turbines described in Conditions 7.1.1 and 7.1.2.
- The affected turbines shall comply with the standard in Condition 5.2.2(b), which addresses the opacity of the emission of smoke or other particulate matter from emission units, pursuant to 35 IAC 212.123.
- The affected turbines are subject to the NSPS for Stationary Gas Turbines, 40 CFR 60 Subpart GG and applicable provisions in 40 CFR 60, Subpart A, General Provisions, because the heat input of each turbine at peak load is equal to or greater than 10.7 gigajoules per hour (10 mmBtu/hr), based on the lower heating value of the fuel fired and construction of each turbine commenced after October 3, 1977. The Illinois EPA administers the NSPS for subject sources

in Illinois pursuant to a delegation agreement with the USEPA.

i. Standard for Nitrogen Oxides:

Pursuant to 40 CFR 60.332(a) and (b), no owner or operator of an affected turbine shall cause to be discharged into the atmosphere from such gas turbine, any gases which contain nitrogen oxides in excess of:

$$\text{STD} = 0.0075 \frac{(14.4)}{Y} + F$$

Where:

STD = Allowable NO_x emissions (percent by volume at 15 percent oxygen and on a dry basis).

Y = Manufacturer's rated heat rate at manufacturer's rated load (kilojoules per watt hour) or, actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the turbine. The value of Y shall not exceed 14.4 kilojoules per watt hour.

F = Optional NO_x emission allowance for fuel-bound nitrogen calculated from the nitrogen content of the fuel as follows. (The Permittee may accept an F-value of zero and be excused from fuel monitoring for nitrogen content. See also Condition 7.1.8(b) (ii).)

Fuel-bound nitrogen (percent by weight)	F (NO _x percent by volume)
$N \leq 0.015$	0
$0.015 < N \leq 0.1$	0.04 (N)
$0.1 < N \leq 0.25$	$0.004 + 0.0067(N - 0.1)$
$N > 0.25$	0.005

Where:

N = The nitrogen content of the fuel (percent by weight) determined in accordance with Condition 7.1.8.

ii. Standard for Sulfur Dioxide

An owner or operator of an affected turbine shall either: (1) Not cause to be discharged into the atmosphere from the turbine any gases which contain sulfur dioxide in excess of 0.015 percent by volume at 15 percent oxygen

and on a dry basis; or (2) Not burn in the turbine any fuel which contains sulfur in excess of 0.8 percent by weight [40 CFR 60.333(a) and (b)].

- d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to excess 2000 ppm [35 IAC 214.301].
- e.
 - i. No owner or operator shall cause or allow the emissions of NO_x into the atmosphere from each affected turbine to exceed 0.25 lbs/mmBtu of actual heat input during each ozone control period from May 1 through September 30, based on a ozone control period average, for that unit [35 IAC 217.706(a)].
 - ii. Notwithstanding the above emission limitation of 35 IAC 217.706(a), affected turbines that are subject to more stringent NO_x emission limitations pursuant to any State or federal statute, including the Act, the Clean Air Act, or any regulations promulgated thereunder, shall comply with both the requirements of 35 IAC 217 Subpart V and those more stringent emission limitations [35 IAC 217.706(b)].

f. Startup Provisions

The Permittee is authorized to operate an affected turbine in violation of the applicable limit of 35 IAC 212.123(a) (see Condition 5.2.2(b)) during startup pursuant to 35 IAC 201.262, as the Permittee has affirmatively demonstrated that all reasonable efforts have been made to minimize startup emissions, duration of individual starts, and frequency of startups. This authorization is subject to the following:

- i. This authorization only extends for a period of up to 20-minutes following initial firing of fuel during each startup event.
- ii. The Permittee shall take the following measures to minimize emissions resulting from startups, the duration of startups, and minimize the frequency of startups:
 - A. Operating in accordance with the manufacturer's written operating and startup procedures, including a pre-check of the unit, or other written procedures developed and maintained by the Permittee so as to minimize the duration of startups and the emissions associated with startups. These procedures should allow for review of operating parameters

of the unit during startup, or shutdown as necessary to make adjustments to reduce or eliminate excess emissions.

B. Maintaining units in accordance with written procedures developed and maintained by the Permittee so as to minimize the duration of startups and the frequency of startups. These maintenance practices shall include maintenance activities before the unit is started up, when the unit is in operation, and when the unit is shut down.

C. The procedures described above shall be reviewed at least annually to make necessary adjustments and shall be made available to the Illinois EPA upon request.

iii. The Permittee shall fulfill the applicable recordkeeping requirements of Condition 7.1.9(a).

7.1.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected turbines not being subject to the requirements of 35 IAC 212.321 and 212.322, because due to the nature of these units, a process weight rate can not be set so that such rules can not reasonably be applied, pursuant to 35 IAC 212.323.

b. The affected turbines are not subject to 35 IAC 217.141, because the affected turbines are not by definition fuel combustion emission units.

c. The affected turbines are not subject to 35 IAC 216.121, because the affected turbines are not by definition fuel combustion emission units.

d. This permit is issued based on the affected turbines not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources:

i. For affected turbines CTG01 through CTG04, this is because these turbines do not use add-on control devices to achieve compliance with an emission limitation or standard.

ii. For affected turbines CTG05 through CTG10 (which are equipped with water injection control for NOx emissions), this is because these turbines are not large pollutant-specific emission units, i.e., the potential to emit of each turbine for NOx is less than the applicable major source

threshold (100 tons/year), pursuant to 40 CFR 64.5(a). (See also Condition 7.1.5(e).)

7.1.5 Operational and Production Limits and Work Practices

- a. i. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate any affected turbine in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or the USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [40 CFR 60.11(d)]
- ii. With respect to startup, the Permittee shall use all reasonable efforts to minimize startup emissions, including implementing established startup procedures to minimize startup emissions. These procedures shall be reviewed and enhanced consistent with good air pollution control practice based on actual operating experience and performance of the affected turbines. [T1]
- b. Natural gas shall be the only fuel in the affected turbines. [T1]
- c. The affected turbines, in total, shall not fire more than 9,878 million scf per year of natural gas. [T1]
- d. i. Affected turbines CTG01, CTG02, CTG03 and CTG04 shall be equipped, operated, and maintained with low NO_x combustors to control NO_x emissions. [T1]
- ii. Affected turbines CTG05, CTG06, CTG07, CTG08, CTG09 and CTG10 shall be equipped, operated, and maintained with water injection to control NO_x emissions. [T1]

Note: The above limitations in Conditions 7.1.5(a)(ii), (b), (c), and (d) were established in Permit 99110018.

- e. i. The NO_x emissions of affected turbines CTG05 through CTG10 shall each not exceed 99 tons/year.
- ii. Affected turbines CTG05 through CTG10 shall each not operate for more than 4,800 hours per year.

Note: The above limitations are established in this CAAPP permit for affected turbines CTG05 through CTG10 so that each turbine is not a large pollutant-specific emission unit for purposes of CAM, as CAM Plans would otherwise be required for each turbine in conjunction with the issuance of this modified CAAPP permit, pursuant to 40 CFR 64.5(a).

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected turbines are subject to the following:

- a. i. Emissions from affected turbines CTG01, CTG02, CTG03, and CTG04 each shall not exceed the following limits, except during startup as addressed below. [T1]

<u>Pollutant</u>	<u>(Lb/Hour)</u>
NOx	105.0
CO	31.0
SO ₂	1.1
VOM	3.0
PM	9.0

- ii. Emissions from affected turbines CTG05, CTG06, CTG07, CTG08, CTG09, and CTG10 each shall not exceed the following limits, except when ice fog is deemed a traffic hazard by the Permittee and during startup as addressed below. [T1]

<u>Pollutant</u>	<u>(Lb/Hour)</u>
NOx	41.0
CO	45.0*
SO ₂	0.27
VOM	4.0
PM	3.0

*When ambient temperature is less than 59°F, emissions of CO shall not exceed 192 lb/hour each and 1,152.0 lb/hour total

- iii. The Permittee is authorized to operate an affected turbine in excess of the above limits during startup provided that all reasonable efforts are made to minimize startup emissions. This authorization only extends for a period of up to 20 minutes following initial firing of fuel during each startup event. [T1]
- iv. A. Operating data and appropriate emission factors shall be used to determine hourly emission rates except for NOx emissions.

- B. I. NOx emissions shall generally be determined by emissions or parametric monitoring performed in accordance with Condition 7.1.8.
- II. For shutdown of the turbines, if NOx emissions are monitored by Low Mass Emissions Excepted Methodology as provided in Condition 7.1.8(c), the NOx emissions during each shutdown hour need not be determined using this methodology but may be determined using an appropriate factor developed from the historic NOx CEMS emissions data or from future emissions monitoring.
- b. i. Emissions from the affected turbines total shall not exceed the following limitations. Compliance with annual limits shall be determined from a running total of 365 days of data, i.e., from the sum of the data for the current day plus the preceding 364 days. [T1R]

<u>Pollutant</u>	<u>(ton/year)</u>
NOx	244.5
CO	210.0
SO ₂	3.0
VOM	9.1
PM	28.5

- ii. A. For purposes of complying with these annual limits, emissions of CO and VOM shall be determined using other appropriate factor, if standard factors pursuant to Condition 7.1.6(a) (iv) (A) do not adequately account for emissions during startup.
- B. NOx emissions shall be determined using the data from the monitoring performed in accordance with Condition 7.1.8.

Note: The above limitations were originally established in Permit 99110018, pursuant to PSD and subsequently included in the source's initial CAAPP permit. The NOx emission limit has been lowered from 247.0 to 244.5 tons/year to accommodate emissions from additional support equipment to the source as identified in Section 7.2. and 7.3 of this permit. These limits ensure that the source does not constitute a major source pursuant to Title I of the CAA, specifically the PSD rules, with the additional support equipment.

7.1.7 Testing Requirements

- a. The Permittee shall comply with the applicable testing requirements of 40 CFR 60.8 and 60.335 for the affected turbines.

7.1.8 Monitoring Requirements

- a. i. Pursuant to 40 CFR 60.334(a), the Permittee shall install, operate and maintain continuous monitoring systems to monitor and record:
 - A. The fuel consumption for each affected turbine.
 - B. For affected turbines CTG05 through CTG10, the ratio of water to fuel being fired.
- ii. For affected turbines CTG05 through CTG10 during emission testing, the continuous monitoring systems must be operated concurrently with each EPA Method 20, ASTM D6522-00, or EPA Method 7E run and shall be used to determine the fuel consumption and the water to fuel ratio necessary to comply with the applicable 40 CFR 60.332 NOx emission limit. [40 CFR 60.335(b)(4)]
- b. i. The Permittee shall monitor the fuel being fired in each affected turbine for total sulfur content pursuant to 40 CFR 60.334(h)(1), unless the Permittee demonstrates that fuel for an affected turbine meets the definition of "natural gas" in 40 CFR 60.331(u), in accordance with 40 CFR 60.334(h)(3) and (i)(2).
- ii. If the Permittee relies on an allowance for fuel bound nitrogen (F-value) in the fuel for an affected turbine for the purpose of determining compliance with Condition 7.1.3(c)(i), the Permittee shall conduct monitoring for the nitrogen content of such fuel in accordance with 40 CFR 60.335(b)(9) and 60.334(i)(2), as provided by 40 CFR 60.334(h)(2). Otherwise, monitoring of fuel nitrogen content is not required.
- c. i. This permit is issued based on the affected turbines qualifying for alternative monitoring for emissions of NOx under 40 CFR Part 75, i.e., 40 CFR 75.19, Low Mass Emissions Excepted Methodology.

- ii. As provided by 40 CFR 75.19(a), for each affected turbine, to maintain its eligibility to use Low Mass Emissions Excepted Methodology as related to emissions of NO_x:
 - A. The calculated NO_x emissions of the affected turbine shall not exceed 100 tons in a year and 50 tons of NO_x during the ozone season, as determined using the methodology specified in 40 CFR 75.19(c).
 - B. The Permittee shall demonstrate on an annual basis in accordance with 40 CFR 75.19(b) (1) that the above criteria have been met.
 - C. The Permittee shall keep records for each affected turbine of operating time, fuel usage, water injection (for CTG05 through CTG10), and unit output in accordance with 75.19(c) (2).
- iii. In the event that an affected turbine ceases to meet the eligibility requirements for use of Low Mass Emissions Excepted Methodology, the Permittee shall install, operate and maintain a NO_x CEMS on such turbine to fully comply with the applicable monitoring requirements of the federal Acid Rain Program, as specified in 40 CFR 75.12 and 75.13, by December 31 of the following calendar year, in order to remain in compliance with the provisions of the Acid Rain Program, as provided by 40 CFR 75.19(b) (2).
- d. In the event that the Permittee must install, operate and maintain a NO_x CEMS on an affected turbine, as addressed by Condition 7.1.8(c) (iii), for such unit:
 - i. The Permittee shall install, calibrate, certify, maintain, operate and quality-assure CEMS for NO_x, pursuant to 35 IAC 217.710(a) and 40 CFR 60.334(b).
 - ii. When the above requirements for a NO_x CEMS have been met for an affected turbine, as confirmed by notification to the Illinois EPA, the requirements of Condition 7.1.8(a) and (c) shall no longer apply for such turbine.
- e. The Permittee shall keep records for operation of required monitoring systems, records for any periods during which such monitoring system was not operational, with explanation.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected turbines pursuant to Section 39.5(7) (b) of the Act:

- a. An operating log or other records for each affected turbine, that, at a minimum, includes the following information:
 - i. The information that must be kept pursuant to 40 CFR 60.7(b).
 - ii. The following detailed information for each startup:
 - A. Date and duration of the startup, i.e., start time and time normal operation achieved.
 - B. If excess opacity may have occurred after the first 20 minutes following initial firing of fuel during a startup or if normal operation was not achieved within 30-minutes, an explanation why startup could not be achieved more quickly.
 - C. An explanation why established startup procedures could not be performed, if not performed.
 - D. The nature of opacity, i.e., severity and duration, during the startup and the nature of opacity at the conclusion of startup, if above normal.
 - E. Whether exceedance of Condition 5.2.2 may have occurred during startup, with explanation and estimated duration (minutes).
- b. Manufacturer's written operating and startup procedures or other written procedures developed and maintained by the Permittee as required in Condition 7.1.3(f).
- c. A maintenance and repair log for each affected turbine, including the water injection system for the affected turbines CTG05 through CTG10, listing each activity performed with date.
- d.
 - i. Heat content of the fuel being fired in the affected turbines.

- ii. The sulfur content of the fuel fired in the affected turbines, if such data must be collected pursuant to 40 CFR 60.334 or 40 CFR Part 75, Appendix D.
- e. The following operating records for each affected turbine:
 - i. Operating hours, hr/day and hr/year.
 - ii. Fuel consumption, scf/day and scf/year.
 - iii. For affected turbines CTG05 through CTG10:
 - A. Operating hours (hr/year) and NO_x emissions (tons/yr) of each turbine.
 - B. Water usage in each water injection system (gal/day and gal/year).
 - C. Any period when an affected turbine was in operation during which ice fog was deemed to be a traffic hazard, the ambient conditions existing during the periods, the date and time the water injection system was deactivated, and the date and time the system was reactivated.
- f. The total amount of natural gas fired in the affected turbines (million scf/month and million scf/year), on a monthly basis.
- g. The following records related to emissions of the affected turbines:
 - i. A file containing the following information:
 - A. Standard emission factors for pollutants other than NO_x.
 - B. Discussion of startup and shutdown emission factors.
 - C. Discussion of startup and shutdown emission factors for NO_x.
 - ii. Any day in which emissions or opacity exceeded an applicable standard or limit, with description and explanation.
 - iii. Records of emissions of NO_x, CO, SO₂, VOM and PM from the affected turbines, including emissions from startups, with supporting calculations including documentation on the validity of the emission factors used, ton/day and ton/yr.

- iv. For the ozone control period, the applicable records related to NO_x emissions required by 40 CFR Part 75 including, but not limited to, applicable provisions of 40 CFR 75.19 and 75.54. [35 IAC 217.712(a)]

7.1.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA of deviations of an affected turbine with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:
 - i. Notification within 30 days for operation of an affected turbine that was not in compliance with applicable requirements of Condition 7.1.3(c)(ii) or (d), 7.1.5(b), (c) or (d), and 7.1.6(b).
 - ii. Notification in a quarterly report for deviations not addressed above by Condition 7.1.10(a)(i), including deviations from other applicable requirements, e.g., emission monitoring requirements, and recordkeeping requirements.
- b.
 - i. The Permittee shall submit periodic reports for each affected turbine in accordance with 40 CFR 60.7(c) and 60.334(j)(5).
 - ii. The Permittee shall fulfill the applicable reporting requirements of 40 CFR Part 75 related to NO_x emissions, pursuant to 35 IAC 217.712(a).
- c. Pursuant to 35 IAC 217.712(c) and (d), no later than November 30 of each year, the Permittee shall submit a report to the Illinois EPA that demonstrates that the affected turbines have complied with Condition 7.1.3(e). These reports shall be accompanied by a certification statement signed by a responsible official for the Permittee as specified by 35 IAC 217.712(c).
- d. The Permittee shall notify the Illinois EPA within 10 days if NO_x emissions exceed 160 tons/year.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.1.12 Compliance Procedures

- a. Compliance with Conditions 7.1.3(c)(i) and (e), NO_x emissions standards, is addressed by the monitoring

requirements of Condition 7.1.8 and by the recordkeeping requirements of Condition 7.1.9.

- b. Compliance with Condition 7.1.3(c) (ii) and (d), SO₂ emission standards, is addressed by Condition 7.1.5(b), which provides that natural gas shall be the only fuel used in the affected turbines, by the monitoring requirements of Condition 7.1.8 and by the recordkeeping requirements of Condition 7.1.9.
- c. Compliance with the emission limits in Conditions 5.5 and 7.1.6 is addressed by the provisions of Conditions 7.1.5, 7.1.6, 7.1.7, 7.1.8 and 7.1.9.

7.2 Natural Gas Fired Heaters

7.2.1 Description

The Permittee operates natural gas fired water heaters to support the operation of the turbines.

The natural gas heaters are used to heat natural gas fuel prior to combustion in the turbines. Only the larger heater is normally used for this purpose. The emergency heater is available to support "black start" operation of the turbines, as further addressed in Section 7.3.

The inlet air water heaters are used for cold weather operation of the six smaller turbines. For such purpose, they heat water that is circulated in coils in the inlet of the turbines to heat the inlet air to the turbines.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
HTR-1	Natural gas heater (12 mmBtu/hr)	None
EHT-1	Emergency natural gas heater (1 mmBtu/hr)	None
IAT-5A/B to 8A/B	4 Inlet air dual water heaters (2 burners, @ 2.4 mmBtu/hr ea.)	None

7.2.3 Applicability Provisions and Applicable Regulations

- a. The "affected heaters" for the purpose of these unit-specific conditions, are heaters described in Conditions 7.2.1 and 7.2.2.
- b. The affected heaters shall comply with the standard in Condition 5.2.2(b), which addresses the opacity of the emission of smoke or other particulate matter from emission units, pursuant to 35 IAC 212.123.
- c. The affected heater HTR-1 is subject to the NSPS for Small Industrial-Commercial Institutional Steam Generating Units, 40 CFR 60 Subparts Dc, because construction commenced after June 9, 1989 and the heater has a maximum design heat input capacity between 29 megawatts (MW) (100 million Btu per hour (Btu/hr)) and 2.9 MW (10 million Btu/hr). The Permittee must comply with 40 CFR 60.48c(g), which is addressed in Condition 7.2.9(a).
- d. The emissions of CO from the affected heater HTR-1 shall not exceed 200 ppm, corrected to 50 percent excess air, pursuant to 35 IAC 216.121.

7.2.4 Non-Applicability of Regulations of Concern

- a. The provisions of 35 IAC 218.301 and 302, Use of Organic Material, do not apply to fuel combustion emission sources. [35 IAC 218.303]
- b. Affected heaters EHT-1 and IAT-5A/B through 8A/B are not subject to the NSPS for Small Industrial-Commercial Institutional Steam Generating Units, 40 CFR 60 Subpart Dc, because the heaters each have a maximum design heat input capacity that is less than 10 million Btu/hr.

7.2.5 Operational and Production Limits and Work Practices

- a. Natural gas shall be the only fuel fired in the affected heaters. (T1N)
- b.
 - i. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate affected heater HTR-1 in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or the USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [40 CFR 60.11(d)]
 - ii. As part of its operation and maintenance of affected heater HTR-1, the Permittee shall perform formal "combustion evaluation" on the heater each year in which the heater operates for at least 75 hours*, pursuant to Section 39.5(7)(d) of the Act. These evaluations shall consist of diagnostic measurements of the concentration of CO in the flue gas of the affected heater, with adjustments and preventative and corrective measures for the heater's combustion systems to maintain efficient combustion.

* If the affected heater does not operate for 75 hours in a calendar year, the interval between combustion evaluations shall be no greater than 75 hours of heater operation.

7.2.6 Emission Limitations

In addition to the source wide emission limitations in Condition 5.5, the affected heaters are subject to the following limitations:

- a. i. The affected heater HTR-1 shall be equipped with burners designed to emit emissions no more than 0.1, 0.083 and 0.02 lb/mmBtu for NOx, CO, and VOM, respectively.
- ii. Emissions from the affected heater HTR-1 shall not exceed the following limitations [T1R]

<u>Pollutant</u>	<u>Ton/Yr</u>
NOx	1.1
CO	0.9
VOM	0.1

Note: The above limitations contain revisions to limitations in the previous permit and Construction Permit 99110018. The source has requested that the Illinois EPA revise these limitations, consistent with the information provided in this CAAPP application, which also addresses the applicability of Title I of the CAA, specifically MSSCAM and PSD. These revised limitations, together with the revisions to the limitations for the turbines in Condition 7.1.6, continue to ensure that the project addressed by Construction Permit 99100018 does not constitute a new major source pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the NOx and CO emission limits are increased from 0.5 and 0.8 to 1.1 and 0.9 ton/year, respectively, to accommodate a larger heater and more operation than originally planned.

- b. i. Affected heaters EHT-1 and IAT- 5A/B through 8A/B shall each be equipped with burners designed to emit emissions no more than 0.1, 0.083 and 0.02 lb/mmBtu for NOx, CO, and VOM, respectively. [T1N]
- ii. Emissions from affected heaters EHT-1 and IAT- 5A/B through 8A/B, in total, shall not exceed the following limitations. [T1N]

<u>Pollutant</u>	<u>Ton/Yr</u>
NOx	0.1
CO	0.1
VOM	0.02

Note: The above limitations are being established in this permit pursuant to Title I of the CAA, specifically MSSCAM and PSD. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the emissions from the affected heaters EHT-1 and IAT- 5A & B through 8A & B below the levels at which these affected heaters would trigger the applicability of these rules, consistent with the information provided in the CAAPP application.

- c. Compliance with annual limitations shall be determined from a running total of 12 months of data, i.e., from the sum of the data for the current month plus the preceding 11 months.

7.2.7 Testing Requirements

- a. The Permittee shall have the opacity of the exhaust from each affected heater during representative operating conditions determined by a qualified observer in accordance with USEPA Test Method 9, as further specified below, pursuant to Section 39.5(7)(d) of the Act.
 - i. A. On an annual basis, unless the heater operates for less than 75 hours in a calendar year. For this purpose, opacity testing shall first be conducted within the first 50 hours of operation of the heater after the date of issuance of this revised permit.
 - B. Upon written request by the Illinois EPA, such testing shall be conducted within 45 calendar days of the request, or on the date that the affected heater next operates, or on the date agreed upon by the Illinois EPA, whichever is later.
- ii. The duration of opacity observations for each test shall be at least 30 minutes (five 6-minute averages) unless the average opacities for the first 12 minutes of observations (two six-minute averages) are both less than 5.0 percent.
- iii. A. If operation and testing of an affected heater is scheduled more than two hours in advance, when the schedule for testing is set, the Permittee shall notify the Illinois EPA of the time and date, testing is scheduled, in order to allow the Illinois EPA to witness testing.

This notification shall include the name and employer of the observer(s) and identify any concerns for successful completion of observations, i.e., lack of suitable point for proper observation. This condition supersedes the requirements of Condition 8.6.2.

- B. The Permittee shall promptly notify the Illinois EPA of any changes in the time and date of testing.
- iv. The Permittee shall provide a copy of its observer's readings to the Illinois EPA at the time of observations, if Illinois EPA personnel are present at the conclusion of observations.
- v. The Permittee shall submit a written report for these observations within 15 days of the date of observation. This report shall include:
 - A. Date, place, and time of observations.
 - B. Name and employer of certified observer.
 - C. Copy of current certification.
 - D. Description of observation conditions.
 - E. Description of heater operating conditions.
 - F. Raw data.
 - G. Opacity determination.
 - H. Conclusion.

7.2.8 Emission Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected heaters, pursuant to Section 39.5(7) (b) of the Act:

- a. Records of natural gas fuel usage, with supporting information (scf/month and scf/year).
- b. Records of operating hours of each affected heater, (hours/month and hours/year).
- c. Records of emissions (ton/month and ton/yr) of NO_x, CO, and VOM from affected heater HTR-1 and from other

affected heaters, as shown with supporting calculations including documentation for the emission factors used.

- d. Records for all opacity measurements made in accordance with USEPA Method 9 for an affected heater it conducts or that are conducted on its behest by individuals who are qualified to make such observations. For each occasion on which such observations are made, these records shall include the identity of the observer, a description of the various observations that were made, the observed opacity, and copies of the raw data sheets for the observations.
- e. Records for inspection and maintenance of each affected heater, including the combustion evaluation performed for the affected heater HTR-1 as required by Condition 7.2.5(b) (ii).

7.2.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, of deviations of the affected heaters with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:
 - i. Emissions from or operation of an affected heater or heaters in excess of the limits specified in Condition 7.2.3, 7.2.5(a) and 7.2.6 within 30 days of such occurrence.
 - ii. Notification with the quarterly reports required for the turbines by Condition 7.1.10(b) for deviations not addressed above by Condition 7.2.10(a)(i), including deviations from other applicable requirements, e.g., other applicable emission standards, work practice requirements, and recordkeeping requirements.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.2.12 Compliance Procedures

- a. Compliance with the opacity standard of Condition 7.2.3(b) is addressed by the testing and recordkeeping requirements of Conditions 7.2.7 and 7.2.9, respectively.
- b. Compliance with the CO emission standard of Condition 7.2.3(d) for the affected heater HTR-1 is addressed by the work practices and recordkeeping required by Conditions 7.2.5(a) and 7.2.9, respectively.

- c. Compliance with the emission limits in Conditions 5.5 and 7.2.6 shall be determined by using appropriate emission factors, (which in order of preference are emission factors based on manufacturers data, and published USEPA emission factors) and the recordkeeping requirements in Condition 7.2.9.

7.3 Diesel Engine

7.3.1 Description

The Permittee has one distillate fuel oil fired internal combustion engine. The engine provides "Black Start" capability to the source allowing it to start the turbines in the event of a blackout and outage of the surrounding power grid. In such an event, this capability would assist in restoring power to the grid, since the source is not dependent on an external supply of power for startup. In addition to operating during emergency conditions, the engine is also operated periodically to confirm availability for emergency service.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
EDG-1	Emergency diesel engine generator (Nominal 1100 KW)	None

7.3.3 Applicability Provisions and Applicable Regulations

- a. The "affected engine" for the purpose of these unit-specific conditions is the engine described in Conditions 7.3.1 and 7.3.2.
- b. The affected engine shall comply with the standard in Condition 5.2.2(b), which addresses the opacity of the emission of smoke or other particulate matter from emission units, pursuant to 35 IAC 212.123.
- c.
 - i. The sulfur dioxide emissions from the affected engine shall not exceed 0.3 lb/mmBtu in any one hour period, pursuant to 35 IAC 214.122(b) (2) and 214.304.
 - ii. The affected engine is subject to 35 IAC 214.301, which provides that no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.

7.3.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected engine not being subject to the requirements of 35 IAC Part 212, Subpart L, because a process weight rate can not be set, due to the nature of such unit, so that these rules cannot reasonably be applied, pursuant to 35 IAC 212.323.
- b. This permit is issued based on the affected engine not being subject to the requirements of the federal Acid Rain Program, except for the provisions in 40 CFR 72.2 through 72.7 and 72.10 through 72.13,

because the affected engine meets the new unit exemption requirement of 40 CFR 72.7(a), i.e., the affected engine's name plate capacity is less than 25 MWe and the engine burns only fuels with a sulfur content of 0.05 percent or less by weight, on an annual average.

- c. i. This permit is issued based on the affected engine not being subject to the control requirements of 40 CFR 63 Subpart ZZZZ, the NESHAP for Reciprocating Internal Combustion Engines, because the engine meets the exemption for a limited use engine, i.e., the engine is operated less than 100 hours per year, as provided by 40 CFR 63.6585(b) (3).
- ii. The Permittee shall keep records to confirm that the affected engine continues to meet the applicable criterion for a limited use engines. If the engine ever fails to meet the criterion for exemption for a limited use engine, this shall be treated as a deviation, which the Permittee shall report to the Illinois EPA within 30 days in accordance with Condition 7.3.10(a).

7.3.5 Operational and Production Limits and Work Practices

- a. The fuel used in the affected engine shall contain no more than 0.05 percent by weight sulfur on an annual average basis, pursuant to 40 CFR 72.7(a) (3).
- b. The affected engine shall not operate for more than 90 hours per year [T1N].
- c. i. If the affected engine is routinely operated or exercised to confirm that the engine will operate when needed, the operation and opacity of the engine shall be formally observed by operating personnel for the engine or a member of Permittee's environmental staff on a regular basis to assure that the engine is operating properly, which observations shall be made at least every six months.
- ii. If the affected engine is not routinely operated or exercised, i.e., the time interval between operation of the affected engine is typically greater than six months, the operation and opacity of the affected engine shall be formally observed as provided above each time the Permittee carries out a scheduled exercise of the affected engine.
- iii. The Permittee shall also conduct formal observations of operation and opacity of the affected engine upon written request by the

Illinois EPA. With the agreement of the Illinois EPA, the Permittee may schedule these observations to take place during periods when it would otherwise be operating the affected engine.

7.3.6 Emission Limitations

- a. Emissions from the affected engine shall not exceed the following limitations. Compliance with these limitations shall be determined from a running total of 12 months of data [T1N].

<u>Pollutant</u>	<u>lb/Hr</u>	<u>Ton/Yr</u>
NOx	40	1.8
CO	6.7	0.3
VOM	1.0	0.05

Note: The above limitations are being established in this permit pursuant to Title I of the CAA, specifically MSSCAM and PSD. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the emissions from the affected engine below the levels at which this engine would trigger the applicability of the substantive requirements of these rules, consistent with the information provided in the CAAPP application.

7.3.7 Testing Requirements

- a. The Permittee shall have the opacity of the exhaust from the affected engine during representative operating conditions determined by a qualified observer in accordance with USEPA Test Method 9, as further specified below, pursuant to Section 39.5(7)(d) of the Act.
- i. A. On an annual basis, unless the engine operates for less than 50 hours in a calendar year. For this purpose, opacity testing shall first be conducted within the first 25 hours of operation of the engine after the date of issuance of this revised permit.
- B. Upon written request by the Illinois EPA, such testing shall be conducted for the engine within 45 calendar days of the request, or on the date the affected engine next operates, or on the date agreed upon by the Illinois EPA, whichever is later.
- ii. The duration of opacity observations for each test shall be at least 30 minutes (five 6-minute averages) unless the average opacities for the first 12 minutes of observations (two six-minute

averages) are both less than 10.0 percent.

- iii. A. The Permittee shall notify the Illinois EPA at least 7 days in advance of the date and time of testing, in order to allow the Illinois EPA to witness testing. This notification shall include the name and employer of the observer(s) and identify any concerns for successful completion of observations, i.e., lack of suitable point for proper observation or inability to conduct observations under specified operating conditions. This condition supersedes the requirements of Condition 8.6.2.
- B. The Permittee shall promptly notify the Illinois EPA of any changes in the date or time of testing.
- iv. The Permittee shall provide a copy of its observer's readings to the Illinois EPA at the time of testing, if Illinois EPA personnel are present.
- v. The Permittee shall submit a written report for these observations within 15 days of the date of observation. This report shall include:
 - A. Date and time of testing.
 - B. Name and employer of qualified observer.
 - C. Copy of current certification.
 - D. Description of observation conditions.
 - E. Description of engine operating conditions.
 - F. Raw data.
 - G. Opacity determinations.
 - H. Conclusions.

7.3.8 Emission Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected engine, pursuant to Section 39.5(7)(b) of the Act:

- a. i. An operating log, which shall include the following information:

- A. Information for each time the engine is operated, with date, time, duration, and purpose (i.e., exercise or power service).
 - B. Information for the observations conducted pursuant to Condition 7.3.5(c), with date, time, personnel, and findings.
 - C. Information for any incident in which the operation of the engine continued during malfunction or breakdown, including: date, time, and duration; a description of the incident; whether emissions exceeded or may have exceeded any applicable standard; a description of the corrective actions taken to reduce emissions and the duration of the incident; and a description of the preventative actions taken.
 - D. Information identifying any deviation from Condition 7.3.5(c) or 7.3.7.
- ii. A maintenance and repair log, listing each activity performed with date.
- b. i. Records for each shipment of fuel for the affected engine, including date, supplier, quantity (in gallons), sulfur content, heat content, whether the sulfur content meets the requirement in Condition 7.3.5(a), and whether the SO₂ emissions from the burning of such fuel would meet the standard in Condition 7.3.3(c) (i).
- Note: These records are also required by 40 CFR 72.7(f) (3).
- ii. Total fuel usage (gallons/month and gallons/year).
 - c. The annual average sulfur content of the fuel burned in the engine, determined in accordance with 40 CFR 72.7(d), with supporting calculations.
 - d. Records of operating hours (hours/month and hours/year).
 - e. i. A file containing manufacturers specification for the affected engine's rated load and associated emission factors.
 - ii. Data for the maximum hourly emission rates (lb/hr) from the affected engine, with supporting calculations.
 - f. Records of the actual emissions (ton/month and ton/year) of NO_x, CO, and VOM, with supporting calculations.

- g. Records for opacity observations made in accordance with USEPA Method 9 for the affected engine that it conducts or that are conducted on its behest by individuals who are qualified to make such observations. For each occasion on which such observations are made, these records shall include the identity of the observer, a description of the various observations that were made, the observed opacity, and copies of the raw data sheets for the observations.

7.3.10 Reporting Requirements

a. Reporting of Deviations

For the affected engine, the Permittee shall promptly notify the Illinois EPA of deviations from permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act:

- i. Notification within 30 days for a deviation from Condition 7.3.3, 7.3.5(b) or (c), or 7.3.6 with a copy of the applicable records for the incident and a discussion of the probable cause of deviation, the corrective actions taken, and the preventative measures taken.
- ii. A. Reporting with the quarterly report required by Condition 7.1.10(b) for the turbines for other deviations not addressed above by Condition 7.3.10(a)(i), including deviations from other applicable emission standards, work practice requirements, and recordkeeping requirements. For this purpose, these reports shall include a description of each incident and a discussion of the probable cause of the deviation, the corrective actions taken, and the preventative measures taken.
 - B. With the quarterly report, the Permittee shall also address deviations that occurred during the quarter that have been separately reported to the Illinois EPA, with a summary of such deviations. For this purpose, the Permittee need not resubmit the detailed information provided in the initial notifications and reports for such deviations.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.3.12 Compliance Procedures

- a. Compliance with the opacity limits specified in Condition 7.3.4(a) is addressed by the testing and recordkeeping requirements of Conditions 7.3.7 and 7.3.9, respectively.
- b. Compliance with Condition 7.3.3(c) is addressed by records required by Condition 7.3.9(b). For this purpose, complete conversion of sulfur to SO₂ shall be assumed, e.g., SO₂ emissions in lb/mmBtu are twice the sulfur content of the fuel supply, in lb/mmBtu.

Note: Separate records are not being required for Condition 7.3.3(c) (ii) because stoichiometric combustion of oil to emit 0.3 lb SO₂ per million Btu (so as to exactly comply with Condition 7.3.3(c) (i)) would result in an SO₂ concentration in the exhaust of only about 160 ppm based on the F-factor for oil in USEPA's Reference Method 19, which is well below the 2000 ppm limit in Condition 7.3.4(b) (ii).

- c. Compliance with the emission limits in Conditions 5.5 and 7.3.6 shall be determined by using appropriate emission factors, (which in order of preference are emission factors based on manufacturers data and published USEPA emission factors) and the recordkeeping requirements in Condition 7.3.9.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is an affected source under Title IV of the CAA and is subject to requirements pursuant to Title IV of the CAA. To the extent that the federal regulations promulgated under Title IV of the CAA are inconsistent with the requirements of this permit, the federal regulations promulgated under Title IV of the CAA shall take precedence pursuant to Section 39.5(17)(j) of the Act.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;

- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

Monitoring Period

Report Due Date

January - June

September 1

July - December

March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;

- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports and notifications:
 - i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016
 - iii. Illinois EPA - Air Permit Section (MC 11)

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506
 - iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604
- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for

determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
 - ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

- iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and

- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions. [Section 39.5(5)(l), (n), and (o) of the Act]

9.15 General Authority for the Terms and Conditions of This Permit

The authority for terms and conditions of this permit that do not include a citation for their authority is Section 39.5(7)(a) of the Act, which provides that the Illinois EPA shall include such provisions in a CAAPP permit as are necessary to accomplish the purposes of the Act and to assure compliance with all applicable requirements. Section 39.5(7)(a) of the Act is also another basis of authority for terms and conditions of this permit that do include a specific citation for their authority.

Note: This condition is included in this permit pursuant to Section 39.5(7)(n) of the Act.

10.0 ATTACHMENTS

10.1 Attachment 1 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:

Name:

Official Title:

Telephone No.:

Date Signed:

10.2 Attachment 2 - Acid Rain Permit

217-782-2113

ACID RAIN PROGRAM
PERMIT

Reliant Energy - Aurora
Attn: E. A. Feith, Designated Representative
1111 Louisiana
Houston, Texas 77002

Oris No.: 55279
IEPA I.D. No.: 043407AAF
Source/Unit: Reliant Energy Aurora/Combustion Turbine Units 1 through 10
Date Received: December 17, 2004
Date Issued: May 31, 2005
Effective Date: January 1, 2005
Expiration Date: December 31, 2009

STATEMENT OF BASIS:

In accordance with Titles IV and V of the Clean Air Act, the Illinois Environmental Protection Agency is issuing this Acid Rain Program Phase II permit to Reliant Energy for its Aurora facility.

SULFUR DIOXIDE (SO₂) ALLOCATIONS AND NITROGEN OXIDE (NO_x) REQUIREMENTS FOR EACH AFFECTED UNIT:

Combustion Turbine Units 1 through 10	SO ₂ Allowances, Under Tables 2, 3, or 4 of 40 CFR Part 73	2005	2006	2007	2008	2009
		None	None	None	None	None
	Nitrogen Oxide (NO _x) limit	These units are not subject to a NO _x emissions limitation pursuant to 40 CFR Part 76.				

PERMIT APPLICATION: The permit application, which includes SO₂ allowance requirements and other standard requirements, is attached and incorporated as part of this permit. The owners and operators of this source must comply with the standard requirements and special provisions set forth in the application

COMMENTS, NOTES AND JUSTIFICATIONS: This permit contains provisions related to SO₂ emissions and requires the owners and operators to hold SO₂ allowances to account for SO₂ emissions from the affected units. An allowance is a limited authorization to emit up to one ton of SO₂ during or after a specified calendar year. Although this plant is not eligible for an allowance allocated by USEPA, the owners or operators may obtain SO₂ allowances to cover emissions from other sources under a marketable allowance program. The transfer of allowances to and from a unit account does not necessitate a revision to the unit SO₂ allocations denoted in this permit (See 40 CFR 72.84).

Page 2

This permit contains provisions related to NO_x emissions and requires the owners and operators to monitor NO_x emissions from affected units in accordance with applicable provisions of 40 CFR Part 75.

This permit does not affect the source's responsibility to meet all other applicable local, state and federal requirements, including state requirements under 35 Ill. Adm. Code Part 217 Subpart W, which addresses NO_x emissions from Reliant Energy Aurora Units 1 through 10.

If you have any questions regarding this permit, please contact Kunj Patel at 217-782-2113.

ORIGINAL SIGNED BY DONALD E. SUTTON

Donald E. Sutton, P.E.
Manager, Permits Section
Division of Air Pollution Control

DES:KMP:psj

cc: Cecilia Mijares, USEPA Region V
Harish Narayen, IEPA Region 1



Acid Rain Permit Application

For more information, see instructions and refer to 40 CFR 72.33 and 72.34

This submission is: ☐ New ☒ Renewal

STEP 1

Identify the source by
plant name, State, and
ORIS code.

Refiant Energy Aurora	IL	55279
Plant Name	State	ORIS Code

STEP 2

Enter the unit ID#
for every affected
unit at the affected
source in column "a."
For new units, enter the
requested information in
columns "c" and "d."

a	b	c	d
Unit ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)	New Units Commence Operation Date	New Units Monitor Certification Deadline
AGS01	Yes	NA	NA
AGS02	Yes	NA	NA
AGS03	Yes	NA	NA
AGS04	Yes	NA	NA
AGS05	Yes	NA	NA
AGS06	Yes	NA	NA
AGS07	Yes	NA	NA
AGS08	Yes	NA	NA
AGS09	Yes	NA	NA
AGS10	Yes	NA	NA
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		

RECEIVED

DEC 20 2004

IEBL - DAPC - SPFLD

Plant Name (from Step 1)

STEP 3**Read the
standard
requirements****Permit Requirements**

- (1) The designated representative of each affected source and each affected unit at the source shall:
- (i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and
 - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;
- (2) The owners and operators of each affected source and each affected unit at the source shall:
- (i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and
 - (ii) Have an Acid Rain Permit.

Monitoring Requirements

- (1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

- (1) The owners and operators of each source and each affected unit at the source shall:
- (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)), or in the compliance subaccount of another affected unit at the same source to the extent provided in 40 CFR 73.35(h)(3), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
- (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

**STEP 3,
Cont'd.**

Nitrogen Oxides Requirements The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements

- (1) The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an affected unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

- (1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
 - (i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
 - (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.

Reliant Energy Aurora
Plant Name (from Step 1)

Step 3,
Cont'd.

Liability, Cont'd.

(5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.

(6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one affected unit shall not be liable for any violation by any other affected unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.

(7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;

(2) Limiting the number of allowances a unit can hold; *provided*, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;

(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;

(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,

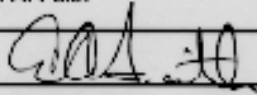
(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

STEP 4

Certification

Read the
certification
statement,
sign, and
date

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

E. A. Felth	
Name	
Signature 	Date 12/17/2004

EPA Form 7510-16 (rev. 12-03)

10.3 Attachment 3 - Guidance

The Illinois has prepared guidance for sources on the Clean Air Act Permit Program (CAAPP) that is available on the Internet site maintained by the Illinois EPA, www.epa.state.il.us. This guidance includes instructions on applying for a revision or renewal of the CAAPP permit.

Guidance On Revising A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-revising.pdf

Guidance On Renewing A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-renewing.pdf

The application forms prepared by the Illinois EPA for the CAAPP are also available from the Illinois EPA's Internet site:

www.epa.state.il.us/air/caapp/index.html

These CAAPP application forms should also be used by a CAAPP source when it applies for a construction permit. For this purpose, the appropriate CAAPP application forms and other supporting information, should be accompanied by a completed Application For A Construction Permit Form (CAAPP Form-199).

Application For A Construction Permit Form (CAAPP Form-199):

www.epa.state.il.us/air/caapp/199-caapp.pdf

10.4 Attachment 4 - Description Of Significant Revisions To This Permit

1. Revised Cover Page

(New page replaces former page)

The permit is identified as a CAAPP Permit, rather than a Title V-CAAPP Permit and Title I Permit. In addition to the new heading, the footnote that previously addressed the possible presence of Title 1 Conditions in the permit has been removed.

Appropriate changes made to identify a revised CAAPP Permit.

2. Revised Table of Contents

(New pages replace former pages)

The Table of Contents revised to lists various new conditions, sections and attachments added to the permit.

3. Revised Section 1.0

(New page replaces former page)

Condition 1.5 - New Condition 1.5 is added to generally address the Title 1 Conditions that are present in the permit, replacing the footnote on this subject formerly on the cover page.

4. Revised Section 4.0, Listing of Significant Emission Units:

(New page replaces former page)

This section now lists the support equipment constructed at the source in 2004, which are added in this revised CAAPP permit.

5. Revised Section 5.0, Overall Source Conditions:

(New pages 10 to 15, replace former pages 10 to 16)

Condition 5.5.1 - To accommodate the new support equipment, the permitted emissions of the plant for purposes of fees are raised by 0.2 ton/year.

Condition 5.5.3 and 5.6.1(b) - Source-wide emission limitations are added to the permit to ensure that the source is not a major source for purposes of PSD or MSSCAM, even with the additional support equipment. In particular, NOx emissions from the source are limited to 249.0 tons/year, whereas they were originally limited to 247.5 tons/year. The new limitations revise previous Title I Conditions originally set in Permit 99110018, prior to the installation of the additional support equipment. Related changes are made to Condition 5.6.1(b), to provide for recordkeeping to verify compliance with these plant-wide emission limitations.

Other - Various revisions are made to other conditions in Section 5 to clarify applicable regulations and notification and reporting requirements. In particular, previous Condition 5.2.8 dealing with a PM10 Contingency Measures Plan is removed, as the plant is not located in an area where this requirement is applicable.

6. Revised Conditions 6.1, NOx Trading Program
(New pages 18, 19 and 22. replace former pages 18 and 22)

Condition 6.1.2 - Turbines CTG05 through CTG10 are now identified as budget EGU for purposes of the NOx Trading Program. This is a change from "low-emitter status" pursuant to 35 IAC 217.754(c) as previously reflected in the CAAPP Permit.

Condition 6.1.8 - For turbines CTG05 through CTG10, the applicable NOx emission rate is now specified for the purpose of determining the allocation of NOx allowances to these turbines.

7. Revised Condition 6.3, Acid Rain Program
(New pages 27 and 28, replace former pages 27 and 28)

Condition 6.3.3 - Monitoring of NOx emissions from the ten turbines at the source may be conducted using the Low Mass Emissions Excepted Methodology, as also provided for by the federal Acid Rain Program, rather than by continuous emission monitoring.

8. Revised Section 7.1, Unit Specific Conditions for Turbines
(New pages 29 to 41, replace former pages 29 to 40)

Condition 7.1.5(e) - Limitations are established restricting operation and emissions of the six smaller turbines to below levels that trigger applicability of Compliance Assurance Monitoring (CAM) under 40 CFR Part 64, replacing previous restrictions on these turbines to maintain low-emitter status. The new restrictions are needed because CAM Plans would be required to accompany this permit revision if the turbines were large pollutant specific emission units for purposes of 40 CFR Part 64.

Condition 7.1.6(b) - A lower limitation is set on annual NOx emissions of the turbines to ensure that the plant is not a major source for purposes of PSD or MSSCAM, even with the additional support equipment. NOx emissions from the turbines are now limited to 244.5 tons/year, whereas they were originally limited to 247.0 tons/year. The lower limitation revises a previous Title I Condition originally set in Permit 99110018, prior to the installation of additional support equipment.

Condition 7.1.8 - Changes to monitoring requirements allow use of the Low Mass Emissions Excepted Methodology Monitoring, 40 CFR 75.19, for monitoring NOx emissions from the turbines, rather than continuous emissions monitoring. Other related changes to monitoring requirements are made consistent with USEPA's recent revisions to 40 CFR Part 60, Subpart GG, including imposition of requirements for monitoring the water to fuel injection rate for the six smaller turbines that use water injection for control of NOx emissions. Various revisions are made to other conditions addressing operational and production limitations, work practices, monitoring, recordkeeping and reporting requirements, and compliance procedures consistent with use of Low Mass Emissions Excepted Methodology for monitoring NOx emissions. In particular, recordkeeping requirements are imposed on each turbine to verify that the applicability criteria for use of the Low Mass Emissions Excepted Methodology continue to be met.

Other - Various revisions also made to other conditions to clarify applicable regulations, notification and reporting requirements. For example, Condition 7.1.3((c), with respect to applicability of the NSPS,

40 CFR Part 60, Subpart GG, is simplified and revised for clarity and consistency with current regulatory provisions.

9. Revised Section 7.2, Unit Specific Conditions for Natural Gas Fired Heaters (New pages 42 to 48, replaces former pages 41 to 44)

General - Condition are revised to also address the emergency natural gas heater and inlet air water heaters installed after the original construction of the plant, as well as the original natural gas heater. Various revisions are made to existing conditions to appropriately address the applicable requirements for the additional units. Operational, testing and recordkeeping requirements are also set for both the added and original units to address compliance with applicable emission control requirements.

Condition 7.2.6 - Limitations are established on annual emissions of the additional heaters to ensure that the plant is still not a major source for purposes of PSD or MSSCAM with these heaters. Because these heaters were not the subjects of a Construction Permit, these Title I Conditions are newly established. Emission limitations for the original heater are also revised, e.g., NO_x emissions from the heater are now limited to 1.1 tons/year, whereas they were originally limited to 0.5 tons/year. These limitations for the original heater revise previous Title I Conditions originally set in Permit 99110018.

10. New Section 7.3, Unit Specific Conditions for Diesel Engine (New pages 49 to 55)

General - This section addresses the diesel engine generator that has been installed at the plant to provide "Black Start" capability in the event of a blackout and outage of the surrounding power grid. The section includes conditions identifying applicable emission control requirements. Operational, testing and recordkeeping requirements are also set for the engine to address compliance with those emission control requirements.

Condition 7.3.6 - Limitations are established on annual emissions of the engine to ensure that the plant is still not a major source for purposes of PSD or MSSCAM with this engine. Because the engine was not the subject of a Construction Permit, these Title I Conditions are newly established.

11. Revised Condition 8.1, Permit Shield

This condition is revised to coordinate the timing of any permit shields to the date of release of the proposed permit, as is appropriate for a permit that has been revised using the procedures for significant permit modifications.

12. New Condition 9.15, General Authority for the Terms and Conditions

This condition is added to the permit to provide the general source of authority for new and revised terms and conditions in the revised permit, as well as for existing terms and conditions in the permit.

13. New Attachment 2, Acid Rain Permit
(New attachment replaces former attachment)

The current Acid Rain Permit issued for the plant, which covers the period from January 1, 2005 to December 31, 2009, is included as Attachment 2 of the permit.

14. New Attachment 3, Guidance
(New page 3-1, replaces former pages 3-1 to 3-3, 4-1, 4-2, 5-1 and 5-2)

New Attachment 3 replaces former Attachments 3, 4 and 5, to provide guidance on relevant permitting procedures for CAAPP Permits by means of a reference to an Internet Site maintained by the Illinois EPA where such guidance is provided.

15. New Attachment 4, Description of the Significant Revisions to This Permit
(New pages 4-1 to 4-4)

This attachment has been added to the permit.